

April 12, 2011

***Ex Parte***

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

*RE: Petition of Telcordia Technologies, Inc. to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration, and Petition of Telcordia Technologies, Inc. to Reform or Strike Amendment 70, to Institute a Competitive Bidding for Number Portability Administration, and to End the LLC's Interim Role in Number Portability Administration Contract Management, WC Docket Nos. 07-149 & 09-109*

*Telephone Number Portability, WC Docket No. 95-116*

Dear Ms. Dortch:

On April 11, 2011, Joel Zamlong and Adam Newman (by telephone), of Telcordia Technologies, Inc. ("Telcordia"), Madeleine Findley, of Wiltshire & Grannis LLP, and I met with Diane Griffin-Holland, Maureen Duignan, and Frank Inserra, of the Office of General Counsel, and Lisa Gelb, William Dever, Ann Stevens, Marilyn Jones and Sanford Williams, of the Wireline Competition Bureau, to discuss Telcordia's suggested revisions to the NAPM/NANC proposed Selection Process for the next Local Number Portability Administrator(s) ("LNPA").

During the meeting, Telcordia made the following points:

- Telcordia's objective has been and continues to be ensuring a fair, open and transparent competitive bidding process.
- The NAPM/NANC Consensus Proposal ("Consensus Proposal") – because it was created before the Bureau's Order – cannot simply be adopted "without modification," because compliance with the Bureau's Order requires changes. As just one example, the Consensus Proposal makes no provision for Wireline Competition Bureau ("WCB" or "Bureau") approval of the Request for Information ("RFI"), Technical Requirements Document ("TRD") or Request for Proposal ("RFP"). Moreover, the WCB clearly vested the authority to recommend the LNPA with the North American Numbering Council ("NANC"), not the North American Portability Management LLC ("NAPM").

- Rather than lengthen the process, Telcordia's suggestions actually streamline the process. Telcordia's suggestion will allow the LNPA Selection Working Group ("SWG") to revise, with the input of the NAPM Future of Numbering Portability Administration Center Subcommittee ("FoNPAC"), the RFI, TRD and RFP, rather than requiring time-consuming and inefficient separate drafting steps by both groups. Moreover, given the likely substantial overlap between FoNPAC and SWG membership, the FoNPAC companies in any event will not be deprived of input into the final SWG proposals. Telcordia's revisions add only one step: a placeholder for a process to create a Technical Requirements Document, as mandated by the Bureau's Order. Telcordia deliberately did not suggest whether that step would have to follow the RFI or could be run in parallel with the RFI, but either would appear feasible.
- Telcordia is at a loss to understand how its suggestion that requiring one of the three SWG co-chairs to be a state public utility commissioner, state regulatory staff person or state consumer advocate designated by the NANC Chair creates a bias in favor of Telcordia or any other vendor.
- NAPM apparently objects to Telcordia's proposed requirement that the FoNPAC's meetings be open to any *SWG member* who opts to attend. This is not a public open meetings requirement, however, but one tailored to the SWG membership only. The SWG makes the final recommendations and, even in NAPM's view, has oversight responsibility. Accordingly, Telcordia can identify no reason why permitting all SWG members, even non-FoNPAC SWG members, to attend FoNPAC meetings with respect to the procurement is objectionable. In fact, permitting SWG members to attend the FoNPAC's meetings would allow the SWG members' viewpoints to be heard and incorporated, thereby further streamlining the document-drafting process.
- NAPM offers no explanation for its objection to disclosing the FoNPAC's membership. Likewise, there is no good reason for NAPM to object to a requirement that the FoNPAC keep minutes, and that it disclose those minutes to the SWG, NANC or FCC upon request (subject to appropriate confidentiality protections).
- The FCC does not need at this time to authorize NAPM to conduct post-implementation contract administration. This Selection Process focuses on the LNPA selection, not the post-implementation period. However, if the FCC chooses to address post-implementation contract administration in the Process, it should clarify that NAPM may not make major modifications to the contract(s) without NANC, if possible, and FCC pre-effectiveness approval.

Ms. Marlene H. Dortch

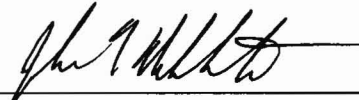
April 12, 2011

Page 3

Telcordia supports NAPM's request that the selection process be determined expeditiously, but does not believe that expediency requires foregoing the simple changes that Telcordia has suggested.

A copy of this letter is being filed in the above-captioned dockets.

Sincerely,



---

John T. Nakahata

Madeleine V. Findley

*Counsel to Telcordia Technologies, Inc.*

cc: Diane Griffin-Holland  
Maureen Duignan  
Frank Inserra  
Lisa Gelb  
William Dever  
Ann Stevens  
Marilyn Jones  
Sanford Williams